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11 THE UNITED STATES DISTRICT COURT  
12 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
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RS

15 CHANEL, INC., ) Case No.  
16 Plaintiff, ) CV 13 2645  
17 v. ) PLAINTIFF'S EX PARTE APPLICATION  
18 THE PARTNERSHIPS OR ) FOR ENTRY OF TEMPORARY  
19 UNINCORPORATED ASSOCIATIONS ) RESTRAINING ORDER, PRELIMINARY  
20 IDENTIFIED ON SCHEDULE "A" and ) INJUNCTION, AND ORDER  
21 DOES 1-100, ) RESTRAINING TRANSFER OF ASSETS  
22 ) TIED TO THE COUNTERFEITING  
23 Defendants. ) OPERATION  
24 )  
25 )  
26 )  
27 )  
28 )

Plaintiff, Chanel, Inc. ("Plaintiff" or "Chanel"), hereby does apply, on an *ex parte* basis, for entry of a temporary restraining order and, upon expiration of the temporary restraining order, a preliminary injunction against Defendants, the Partnerships or Unincorporated Associations identified on Schedule "A" hereto and Does 1-100 (collectively "Defendants"), pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65.

Good cause exists for the foregoing orders. As set forth in the accompanying Memorandum of Points and Authorities, the Defendants and various unknown associates are promoting, selling, offering for sale and distributing counterfeit and infringing Chanel branded products within this

1 Judicial District through the commercial e-stores identified on Schedule "A" hereto (collectively, the  
2 "Subject E-Store Names")<sup>1</sup> and the websites operating under the domain names identified on  
3 Schedule "B" hereto (collectively, the "Subject Domain Names"). The activities of the Defendants  
4 constitute unfair competition and willful and intentional infringement and counterfeiting of Chanel's  
5 trademarks in total disregard of Chanel's rights and have taken place in spite of the Defendants'  
6 knowledge that their use of Chanel's trademarks was and is in direct contravention of Chanel's  
7 rights. The Defendants' unlawful activities have caused and will continue to cause irreparable injury  
8 to Chanel.

9 This Application is based upon the accompanying Memorandum of Points and Authorities  
10 and the Declarations of Stephen M. Gaffigan, Adrienne Hahn Sisbarro, Malerie Maggio, and Eric  
11 Rosaler and exhibits thereto, filed concurrently herewith, and the complete files and records of this  
12 action, and such other matters as Chanel may call to the Court's attention at or before the time of  
13 hearing.

14 Upon entry of a temporary restraining order, the Application, supporting papers, Order,  
15 Complaint and all other pleadings and documents on file in this action will be served on each  
16 Defendant via the corresponding e-mail addresses provided by Defendants (i) as part of the domain  
17 registration data for each of their respective domain names, or (ii) on their Internet websites, and the  
18 customer service e-mail addresses used to communicate with Plaintiff's investigators, or (iii) on each  
19 Defendant via the online submission forms provided on the Internet websites and e-stores operating  
20 under their respective Subject E-Store Names, and provide a copy of the Temporary Restraining  
21 Order by e-mail to the registrar of record for each of their respective domain names, or by other  
22 means reasonably calculated to give notice which is permitted by the Court.

23 WHEREFORE, PREMISES CONSIDERED, Plaintiff respectfully requests this Court grant  
24 its *ex parte* application and enter a temporary restraining order as to Defendants in the form  
25 submitted herewith and schedule a hearing on Chanel's Motion for Preliminary Injunction before the

27 \_\_\_\_\_  
28 <sup>1</sup> The Defendants in this matter operate exclusively from storenvy.com subdomains excepting  
Defendants 3 and 5 which also operate glambling.us and theprettylegk.com, respectively.

1 expiration of the temporary restraining order.

2  
3 Dated: June 10, 2013

KELLER, SLOAN, ROMAN & HOLLAND LLP

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5 By:   
ANNE E. KEARNS  
6 Attorneys for Plaintiff, Chanel, Inc.

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SCHEDULE "A"  
**DEFENDANTS BY NUMBER AND SUBJECT E-STORE NAMES**

Defendant Number	Defendant/Subject E-Store Name
1	helloglitz.storenvy.com
2	phonecandys.storenvy.com
3	storenvy.com/stores/27815-glam-bling
4	glamorme.storenvy.com
5	storenvy.com/stores/46854-the-pretty-little-geek
6	lccboutique.storenvy.com
7	rainbowsmile.storenvy.com

SCHEDULE "B"  
SUBJECT DOMAIN NAMES

Defendant Number	Defendant/Subject Domain Name
3	glambling.us
5	theprettylittlegeek.com